

DOCKET NO. FBT-CV-18-6079698-S	:	SUPERIOR COURT
	:	
SINEAD KLIK and SARA DARCY KLIK	:	J.D. OF FAIRFIELD
	:	
VS.	:	AT BRIDGEPORT
	:	
FAIRFIELD BOARD OF EDUCATION;	:	
TOWN OF FAIRFIELD; MARY LAPIERRE-	:	
GRASSO; and GREG C. HATZIS	:	MARCH 4, 2019

**DEFENDANTS' ANSWER AND SPECIAL DEFENSE
TO PLAINTIFF'S COMPLAINT**

ANSWER:

FIRST COUNT: (Sinead Klik v. Fairfield Board of Education, Mary LaPierre-Grasso and Greg C. Hatzis)

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. Paragraph 4 is admitted.
5. Paragraph 5 is admitted.
6. Paragraph 6 is admitted.
7. As to Paragraph 7, the Defendants have insufficient knowledge with which to form an opinion or belief and therefore leave the Plaintiffs to their proof.
8. Paragraph 8 is denied.
9. As to Paragraph 9, the Defendants have insufficient knowledge with which to form an opinion or belief and therefore leave the Plaintiffs to their proof.
10. Paragraph 10 is denied.
11. Paragraph 11 is denied.

12. As to Paragraph 12, the Defendants have insufficient knowledge with which to form an opinion or belief and therefore leave the Plaintiffs to their proof.

13. Paragraph 13 is denied.

14. Paragraph 14 is admitted.

SECOND COUNT: (Sara Darcy Klik v. Fairfield Board of Education, Mary LaPierre-Grasso and Greg C. Hatzis)

1-14. The answers to Paragraphs 1-14 of the First Count are hereby made the answers to Paragraphs 1-14 of the Second Count as if fully recited and incorporated herein.

15. As to Paragraph 15, the Defendants have insufficient knowledge with which to form an opinion or belief and therefore leave the Plaintiffs to their proof.

THIRD COUNT: (Sinead Klik v. Fairfield Board of Education, Mary LaPierre-Grasso and Greg C. Hatzis)

1-10. The answers to Paragraphs 1-10 of the First count are hereby made the answers to Paragraphs 1-10 of the Third Count as if fully recited and incorporated herein.

11. Paragraph 11 is denied.

12. Paragraph 12 is denied.

13. Paragraph 13 is denied.

14. Paragraph 14 is denied.

15. Paragraph 15 is denied.

16. Paragraph 16 is denied.

17. Paragraph 17 is denied.

18. Paragraph 18 is admitted.

FOURTH COUNT: (Sara Darcy Klik v. Fairfield Board of Education, Mary LaPierre-Grasso and Greg C. Hatzis)

1-18. The answers to Paragraphs 1-18 of the Third Count are hereby made the answers to Paragraphs 1-18 of the Fourth Count as if fully recited and incorporated herein.

19. As to Paragraph 19, the Defendants have insufficient knowledge with which to form an opinion or belief and therefore leave the Plaintiffs to their proof.

FIFTH COUNT: (Sinead Klik v. Town of Fairfield)

1-14. The answers to Paragraphs 1-14 of the First Count are hereby made the answers to Paragraphs 1-14 of the Fifth Count as if fully recited and incorporated herein.

15-32. The answers to Paragraphs 1-18 of the Third Count are hereby made the answers to Paragraphs 15-32 of the Fifth Count as if fully recited and incorporated herein.

33. Paragraph 33 is admitted.

34. As to Paragraph 34, the Defendant has insufficient knowledge with which to form an opinion or belief and therefore leaves the Plaintiff to her proof.

35. As to Paragraph 35, the Defendant has insufficient knowledge with which to form an opinion or belief and therefore leaves the Plaintiff to her proof.

SIXTH COUNT: (Sara Darcy Klik v. Town of Fairfield)

1-35. The answers to Paragraphs 1-35 of the Fifth Count are hereby made the answers to Paragraphs 1-35 of the Sixth Count as if fully recited and incorporated herein.

36. As to Paragraph 35, the Defendant has insufficient knowledge with which to form an opinion or belief and therefore leave the Plaintiff to her proof.

SPECIAL DEFENSE:

Defendants are immune from liability pursuant to General Statutes §52-557(n)(a)(2)(B) which provides in relevant part: "Except as otherwise provided by law, a political subdivision of the state shall not be liable for damages to personal or property caused by ... (B) negligent acts or omissions which require the exercise of judgment or discretion as an official function of the authority expressly or impliedly granted by law." Prescott v. Meriden, 273 Conn. 7, 59; Durrant v. Board of Education, 96 Conn. App. 456.

THE DEFENDANTS

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CERTIFICATION

This is to certify that a copy of the above was or will immediately be mailed or delivered electronically or non-electronically on March 4, 2019, to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served:

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